

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-11069 (CTG)
)
) (Jointly Administered)
)

**CERTIFICATION OF COUNSEL SUBMITTING ORDER APPROVING
STIPULATION RELATING TO THE CENTRAL STATES CLAIMS OBJECTION,
DISCOVERY REQUESTS, AND MOTION TO COMPEL ARBITRATION**

The undersigned counsel hereby certifies that:

1. On or before November 7, 2023, Central States Pension Fund (“CSPF”) filed 45 proofs of claim (the “Proofs of Claim”) against the above-captioned debtors and debtors in possession (the “Debtors”).
2. On December 8, 2023, the Debtors filed an *Objection to the Proofs of Claim Filed by the Central States Pension Fund* (“Claims Objection”) [Dkt. 1322].
3. On December 8, 2023, concurrently with the Claims Objection, the Debtors served their First Set of Interrogatories and First Set of Requests for Production (the “Discovery Requests”) on CSPF, making all objections and responses due January 8, 2023.
4. On January 8, 2024, CSPF filed a *Motion to Compel Arbitration of Withdrawal Liability Disputes, or Alternatively, for Relief from the Automatic Stay to Initiate Arbitration* (“Motion to Compel Arbitration”) [Dkt. 1665].

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

5. The Debtors and CSPF (the “Parties”) have entered into a *Stipulation Relating to the Claims Objection, Discovery Requests, and Motion to Compel Arbitration* (the “Stipulation”).

6. A proposed order approving the Stipulation is attached hereto as **Exhibit A**. The Stipulation is attached as Exhibit 1 to the proposed order.

7. Based on the foregoing, the Parties respectfully request entry of the Order at the Court’s earliest convenience.

Dated: January 17, 2024
Wilmington, Delaware

/s/ Peter J. Keane

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